

AO 91 (Rev. 02/09) Criminal Complaint

# United States District Court

for the  
Western District of New York

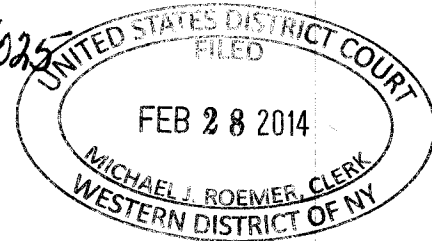
United States of America )

v. )

RONNIE PARKER )

*Defendant*

Case No. 14-MJ-4025



## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of February 7, 2014 in the county of Ontario in the Western District of New York, the defendant violated 18 U.S.C. § 871, an offense described as follows:

the defendant did knowingly and willfully make a threat to take the life of, and to inflict bodily harm upon the President of the United States, specifically, the defendant told your affiant and others that he was going to shoot and kill the President, in violation of Title 18, United States Code, Section, 871.

This criminal complaint is based on these facts:

X Continued on the attached sheet.

Please see attached affidavit

A handwritten signature in black ink, appearing to read "J. Blackerby".

*Complainant's signature*

Joel Blackerby, S/A United States Secret Service

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 2/28/14

A handwritten signature in black ink, appearing to read "Marian W. Payson".

*Judge's signature*

City and State: Rochester, New York

Hon, Marian W. Payson, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

State of New York     )  
County of Monroe    ) ss:  
City of Rochester    )

14-mq-4025

I, Joel D. Blackerby, being duly sworn, state as follows:

1. I am a Special Agent with the United States Secret Service, and have been so employed since January 1996. I am assigned to the Rochester Resident Agency, where my duties include the supervision and investigation of threats against protected individuals, to include but not limited to, the President of The United States, former Presidents and facilities under the direct protection of the United States Secret Service.
2. I make this affidavit in support of a criminal complaint charging RONNIE PARKER (hereafter PARKER) with violating Title 18, United States Code, Section 871 (making a threat against the President of the United States).
3. The information contained in this affidavit is based upon information I have gathered from my investigation, my personal observations, my training and experience and/or information relayed to me by other law enforcement officers and or/agents. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only facts that I believe are necessary to establish probable cause to believe that Title 18, United States Code, Section, 871 has been violated.

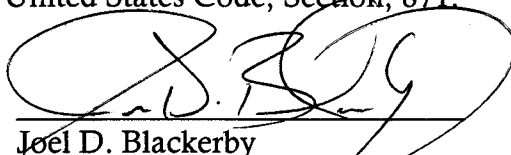
**PROBABLE CAUSE**

4. On 02/06/2014, your affiant was contacted by staff at the Clifton Springs Hospital, Clifton Springs, NY. They advised that PARKER had been admitted for an evaluation earlier in the day because he had been hearing voices, some of which told him to kill the president. Your affiant was further advised that PARKER requested hospitalization because he was afraid and didn't want to act out what the voice was telling him to do.
5. On 02/07/2014, your affiant interviewed PARKER at Clifton Springs Hospital. PARKER entered the room looking disheveled and tired. He spoke very softly, at times even too low. He admitted that he hears voices and has since he was about 16 years old. He advised he started doing what the voices said because if he doesn't they get loud and angry. He stated when he did those things the voices would reward him by telling him he did the right thing and they would make him feel good. PARKER advised he became violent toward people at the same time.

6. PARKER advised that the voices are always there. At one point the subject's eyes became fixed on your affiant, his breathing increased and his pupils became constricted. When asked what the voices were saying to him, he responded by saying "they are telling me to take your gun and shoot you then shoot everyone in this building."
7. PARKER stated he began thinking about killing the President a few days ago after the voices started telling him to "find him and kill him." PARKER spoke clearly about his plan. He stated he would need to find the President's schedule on the internet, find a gun then travel to where he was. He stated he "would have to wait till [the President] got out of the motorcade or came to shake hands." He further stated that he "...would have to kill all the people around [the President] to get to him." He advised that he would find a gun and shoot the President if he came by today.
8. The subject stated he feels the only way to make the voices stop and ease his pain is to do what they are saying which is to kill people. He feels if he got out of the hospital he will kill people.
9. Your affiant asked if the voice had a name, and PARKER replied "DALLAS". When asked if he realized the President had been in Geneva recently he became more alert and said "really" then stared off and said "I'll have to contact my people."

## CONCLUSION

Based on the foregoing, your affiant respectfully submits that there is probable cause to believe that RONNIE PARKER did knowingly and willfully make a threat to take the life of, and to inflict bodily harm upon the President of the United States, specifically, the defendant told your affiant and others that he was going to shoot and kill the President, in violation of Title 18, United States Code, Section, 871.



Joel D. Blackerby  
SPECIAL AGENT  
UNITED STATES SECRET SERVICE

Sworn to before me this  
28 day of February 2014

  
HON. MARIAN W. PAYSON  
U.S. MAGISTRATE JUDGE